

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011

Date filed: January 25, 2012

Name of company(s) covered by this certification: Source Communications, LLC

Form 499 Filer ID: 824178

Name of signatory: Carolyn Malone

Title of signatory: Secretary and Treasurer

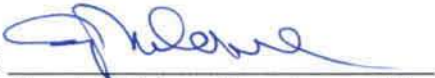
I, Carolyn Malone, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Carolyn Malone, Secretary and Treasurer  
Source Communications, LLC

**Received & Inspected**

**FEB 01 2012**

**FCC Mail Room**

**Source Communications, LLC**  
**Statement of CPNI Operating Procedures**

Source Communications, LLC ("Source") provides terminating minutes of use for resale to one customer. Source does not offer its services to the public.

Source and its one customer have established policies and procedures to comply with the Federal Communications Commission's ("FCC") rules regarding the use, disclosure, and access to section 64.2001 et seq. of the Commission's rules, 47 C.F.R. § 64.2001 et seq. These procedures ensure that Source and its customer are in compliance with the FCC's customer proprietary network information ("CPNI") rules. This statement is a summary of Source's and their customer's policies and procedures designed to safeguard CPNI.

Source's primary business of providing terminating minutes of use for resale to one customer is a substantial aspect of Source's services. Therefore, Source and their customer have substantial processes and controls for both physical security and access to data. Its customer is provided services under contracts with express confidentiality provisions, verification methods to confirm the identity of customers and authorized persons seeking CPNI, and have dedicated account representatives with access to customer data. Source and its customer do maintain and utilize CPNI for the limited purposes of initiating, rendering, billing, and collecting of its services, and may use CPNI, if necessary, to protect its property rights. Source and its customer do not use any CPNI for any marketing purposes. Nor does Source or its customer disclose CPNI or permit access to such CPNI to any third parties other than as necessary to provide service.

Source and its customer trains its personnel in the use of CPNI. Source and its customer have an express disciplinary process in place for any improper use of CPNI.

Source and its customer have implemented measures to discover and to protect against unauthorized attempts to access CPNI. Source and its customer also have implemented procedures pursuant to which it will track breaches of CPNI, and it will notify the United States Secret Service and the Federal Bureau of Investigation. Source will notify its customers (if permitted) of the security breach, and will notify of the breaches and notifications for a two-year period. Source will track customer complaints regarding CPNI.

Source will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has implemented to safeguard CPNI.

## DECLARATION OF CAROLYN MALONE

I, Carolyn Malone, am over the age of 18, do hereby declare:

1. I am the Secretary and Treasurer of Source Communications, LLC. My business address is 307 W. 7th Street, Suite 1600, Fort Worth, TX 76102-5114..
2. I have personal knowledge of the information stated in the attached response. I declare under penalty of perjury that the information contained in the attached letter is true and correct.

Executed on January 25, 2012.



Carolyn Malone  
Secretary and Treasurer  
Source Communications, LLC